

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
Philadelphia Division**

Anita B. Brown,

*Debtor.*

Case No. 19-10921-PM  
Chapter 13

**Motion to Modify Plan After Confirmation**

Debtor Anita B. Brown, through her attorney, moves this Court as follows:

1. The current modified plan was filed on March 2, 2023, and the modification was granted on April 11, 2023.
2. The Debtor wishes to modify the plan to reflect Bank of America's amended claim filed on March 31, 2023, to include missed plan payments, and to increase the plan payment amount to shorten the plan.
3. The Debtor therefore requests approval of the Modified Chapter 13 Plan filed at ECF No. 146.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: September 23, 2024

CIBIK LAW, P.C.  
*Attorney for Debtor*

By: /s/ Michael A. Cibik

Michael A. Cibik (#23110)  
1500 Walnut Street, Suite 900  
Philadelphia, PA 19102  
215-735-1060  
help@cibiklaw.com